

N3B-Los Alamos 1200 Trinity Drive, Suite 150 Los Alamos, New Mexico 87544 (505) 257-7690



Environmental Management Los Alamos Field Office 1200 Trinity Drive, Suite 400 Los Alamos, New Mexico 87544 (240) 562-1122

> Date: December 23, 2021 Refer To: N3B-2021-0464

Mr. Rick Shean Bureau Chief Hazardous Waste Bureau New Mexico Environment Department 2905 Rodeo Park Drive East, Building 1 Santa Fe, NM 87505-6313

Subject: Request for 30-Day Extension for Central Accumulation Area Middle DP Road

Waste

Dear Mr. Shean:

The U.S. Department of Energy Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos (N3B) are requesting a hazardous waste storage extension for two central accumulation areas (CAAs) located at Technical Area 21 (TA-21), both of which currently contain waste excavated as part of the MDPR remediation project. We have 192 20-yd³ rolloff bins, 1 B-25 container, and a 55-gal. drum in the CAAs that are labeled as "hazardous waste pending analysis" or mixed low-level waste (MLLW).

During our fieldwork efforts, we generated over 25 times the planned volume of waste. Because of the large volume of waste we generated during the remediation of MDPR from May 2021 to October 2021 (194 containers, over 2270 metric tons of material generated as low-level waste with a portion being MLLW) requiring characterization, we respectfully request a 30-day extension to the 90-day accumulation time for the CAAs due to unforeseen, temporary, and uncontrollable circumstances in accordance with 40 Code of Federal Regulations Section 262.17(b). The 30-day extension will enable analysis of the remaining bins at the CAAs to be fully characterized and limit the number of waste containers requiring transfer from TA-21 to a Resource Conservation and Recovery Act—permitted storage area at TA-54, Area L or G.

Please contact Emily Day at (505) 695-4243 (em-la.doe.gov) or Arturo Duran at (575) 373-5966 (arturo.duran@em.doe.gov) if you would like to discuss further.

Sincerely,

Joseph Murdock Program Manager

Environment, Safety and Health

N3B-Los Alamos

Sincerely,

15

Digitally signed by BRIAN HARCEK Date: 2021.12.23 11:16:20 -07'00'

For

M. Lee Bishop, Director
Office of Quality and Regulatory Compliance
U.S. Department of Energy
Environmental Management
Los Alamos Field Office

cc (letter and enclosure[s] emailed):

Laurie King, EPA Region 6, Dallas, TX

Chris Catechis, NMED-DOE-OB

Steve Yanicak, NMED-DOE-OB

Neelam Dhawan, NMED-HWB

Jennifer Payne, LANL

Stephen Hoffman, NA-LA

Peter Maggiore, NA-LA

William Alexander, N3B

Carol Anderson, N3B

Larry Baker, N3B

Emily Day, N3B

Ronald DeSotel, N3B

Michael Erickson, N3B

Evangelos Gletsos, N3B

Kim Lebak, N3B

Joseph Legare, N3B

Pamela Maestas, N3B

Ovide Morin, N3B

Gerald O'Leary III, N3B

Duane Parsons, N3B

Kent Rich, N3B

Vince Rodriguez, N3B

Troy Thomson, N3B

Arturo Duran, EM-LA

John Evans, EM-LA

Brian Harcek, EM-LA

Jesse Kahler, EM-LA

Michael Mikolanis, EM-LA

Cheryl Rodriguez, EM-LA

emla.docs@em.doe.gov

n3brecords@em-la.doe.gov

Public Reading Room (EPRR)

PRS website